

# Federal Defenders OF NEW YORK, INC.

David E. Patton

*Executive Director  
and Attorney-in-Chief*

October 23, 2023

The Hon. Philip M. Halpern  
United States District Judge  
United States Courthouse  
300 Quarropas St.  
White Plains, NY 10601

Application granted on consent of the parties. Defendant's motions due 11/29/2023; opposition due 12/29/2023; and reply due 1/11/2024. The status conference scheduled for December 20, 2023 is rescheduled to January 29, 2024 at 11:00 a.m.

The Government is directed to file a proposed order excluding time under the Speedy Trial Act from December 20, 2023 to January 29, 2024.

The Clerk of Court is respectfully directed to terminate the motion sequence pending at Doc. 18.

SO ORDERED.



Philip M. Halpern  
United States District Judge

Dated: White Plains, New York  
October 23, 2023

Re: *United States v. Jamees Cooke*, Case No. 23-cr-08 (PMH)

Dear Judge Halpern,

I am requesting a month-long adjournment of the pretrial briefing schedule in the above-captioned case to give the parties additional time to negotiate a pretrial resolution.

On April 25, 2023, I filed a mitigation submission with the United States Attorney's Office. In August, the USAO advised that they were not persuaded by my mitigation submission and provided a *Pimentel* letter. The parties appeared in Court on August 23, 2023. There, the Court set the following schedule:

Defense motions:	10/27/2023
Government Response:	11/27/2023
Defense Reply:	12/11/2023
Status Conference:	12/20/2023
Final Pretrial Conf.:	2/7/24
Trial:	2/21/24

Since our last appearance on August 23, 2023, I have received hundreds of pages of records relevant to a potential pretrial resolution in this case. I incorporated these voluminous records into a supplemental mitigation submission for the government's consideration. I intend to submit this supplemental mitigation submission by today or tomorrow. As such, I propose the following revised schedule, which will give the parties additional time to find a pretrial resolution.

Defense motions:	11/29/2023
Government Response:	12/29/2023
Defense Reply:	1/11/2024
Status Conference:	A date convenient to the Court in January 2024
Final Pretrial Conf.:	2/7/24
Trial:	2/21/24

I have discussed my request for an adjourned motions schedule with government counsel, AUSA Timothy Ly. He does not object.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rachel Martin', with a stylized, flowing script.

Rachel Martin

cc: AUSA Timothy Ly